

UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF ILLINOIS

E.I. DU PONT DE NEMOURS AND
COMPANY,

Plaintiff/Judgment Creditor,

v.

Case No. 12 Civ 5529

KOLON INDUSTRIES, INC. A/K/A KOLON
CORPORATION,

Defendant/Judgment Debtor,

FILMQUEST GROUP, INC.,

Garnishee.

NOTICE OF MOTION

To: See Certificate of Service

PLEASE TAKE NOTICE THAT on **November 13, 2012** at **8:30 a.m. or as soon thereafter as we may be heard**, we shall appear before the Honorable Judge Lefkow, in courtroom 1925 of the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, Illinois, and present Debtor's Motion **for Judgment**, a copy of which is served upon you herewith.

/s/ Bryan K. Duplechain

Bryan K. Duplechain, IL Bar No. #6284499
333 West Wacker Drive, Suite 500
Chicago, IL 60606
bdup@sanchezdh.com

CERTIFICATE OF SERVICE

The undersigned attorney certifies that copies of this Motion to **Judgment** was served upon the below persons via regular mail, postage prepaid and properly addressed, in addition to those parties receiving notification by participation in the Court's ECF system on the 5th day of November, 2012:

/s/ Bryan K. Duplechain

Bryan K. Duplechain, IL Bar No. #6284499
333 West Wacker Drive, Suite 500
Chicago, IL 60606

UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF ILLINOIS

E.I. DU PONT DE NEMOURS AND
COMPANY,

Plaintiff/Judgment Creditor,

v.

Case No. 12 Civ 5529

KOLON INDUSTRIES, INC. A/K/A KOLON
CORPORATION,

Defendant/Judgment Debtor,

FILMQUEST GROUP, INC.,

Garnishee.

MOTION FOR JUDGMENT AND ORDER

1. Plaintiff/Judgment Creditor has a judgment unsatisfied against the Defendant/Judgment Debtor in this court.

2. As of November 5, 2012, the amount due to the Plaintiff/Judgment Creditor from the Defendant/Judgment Debtor as a result of the judgment is US \$ \$918,727,985.96, inclusive of applicable interest accrued to date.

3. Plaintiff/Judgment Creditor had reason to believe, and did believe, that Garnishee Filmquest Group, Inc., whose business location is 320 Remington Boulevard, Bolingbrook, Illinois 60440, was indebted to the Defendant in amounts exceeding those exempted from garnishment by any state or federal law, or had possession or control of personal property or effects belonging to the Defendant which are not exempted from garnishment by any state or federal law. Accordingly, on August 27, 2012, Plaintiff/Judgment Creditor served the Garnishee with the Writ of Garnishment issued by this Court on August 8, 2012.

4. On October 22, 2012, Garnishee served an Answer to Interrogatories to the Plaintiff/Judgment Creditor, stating that there was due and owing from Garnishee to the Defendant/Judgment Debtor a sum of \$487,627.68 at the time the Writ of Garnishment was served on the Garnishee, of which the Garnishee has claimed set-off of \$225,000.00.

5. Accordingly, Garnishee currently owes the Defendant/Judgment Debtor an undisputed sum of \$262,627.68.

WHEREFORE, the Plaintiff/Judgment Creditor E.I. du Pont de Nemours and Company respectfully requests this Court to issue the attached Judgment and Order for the turnover of \$262,627.68, without prejudice to the Plaintiff/Judgment Creditor's right to apply for the turnover of the whole or a portion of \$225,000.00 claimed set-off at a later date, as appropriate.

Dated: Chicago, Illinois
November 5, 2012

SANCHEZ DANIELS & HOFFMAN LLP

/s/ Bryan K. Duplechain
SANCHEZ, DANIELS & HOFFMAN LLP
333 West Wacker Drive, Suite 500
Chicago, Illinois 60606
(312) 641-1555